

### **REMARKS**

In response to the Office Action mailed on October 3, 2007, the Applicants respectfully request reconsideration in view of the following remarks. In the present application, claims 1, 2, 4-6, 10, 11, 17, 19, 22, 23, 26-31 have been amended. Support for the amendments can be found in the specification at least on page 3, line 29-page 4, line 14 and page 12, lines 4-20. No new matter has been added.

Claims 1-6, 10-14, 16, 17, 19, and 22-31 remain pending in the application. In the Office Action:

1. Claim 11 was rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter;
2. Claims 2, 4-6, 10, 17, 19, 22, 23, and 27-31 are rejected under 35 U.S.C. § 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards at the invention; and
3. Claims 1-6, 10-14, 16, 17, 19, and 22-31 are rejected under 35 U.S.C. § 102(b) as being anticipated by Hanagan et al. (U.S. Pat. Pub. No. 2001/0056362, hereinafter "Hanagan").

#### **Claim Rejections – 35 U.S.C. § 101**

In the Office Action, claim 11 stands rejected as being directed to non-statutory subject matter. Specifically, the Office Action states the "the claim is directed to neither a "process" nor a "machine," but rather embrace[s] or overlap[s] two different statutory classes of invention set forth in 35 U.S.C. 101." The rejection of claim 11 is respectfully traversed. Claim 11 has been amended and applicants respectfully submit the amendment overcomes this rejection. Accordingly, Applicants respectfully request that the pending rejection be withdrawn.

#### **Claim Rejections – 35 U.S.C. § 112, Second Paragraph**

In the Office Action, claims 2, 4-6, 10, 17, 19, 22, 23, and 27-31 stand rejected as failing to point out and distinctly claim the subject matter which Applicants regard as the invention.

Specifically, the Office Action states the “it is unclear what applicant is attempting to set forth by the term “associated with.” This rejection is respectfully traversed. Claims 2, 4-6, 10, 17, 19, 22, 23, and 27-31 have been amended by replacing “associated with” with “related to.” Applicants respectfully submit the amendments overcome this rejection and respectfully request that the pending rejection be withdrawn.

### **Claim Rejections - 35 U.S.C. §102**

Claims 1-6, 10-14, 16, 17, 19, and 22-31 are rejected as being anticipated by Hanagan. The rejection of these claims is respectfully traversed.

Amended claim 1 specifies a method of integrating billing and services management between a wireless telecommunications carrier and a wireline telecommunications carrier. The method includes provisioning a call unit sharing plan allowing a user to charge units of wireless usage and units of wireline usage to one calling plan; receiving wireless usage at a wireless carrier; receiving wireline usage at a wireline usage rating platform; routing the wireless usage to the wireline usage rating platform; receiving a rollover matrix indicating a number of units of call usage that are available for rolling over to a subsequent usage period; rolling over to the subsequent usage period the number of units of call usage that are available for rolling over; and if any of the wireless or wireline usage requires a billing charge, charging any of the wireless or wireline usage to the call unit sharing plan.

It is respectfully submitted that Hanagan fails to teach or suggest each and every feature specified in amended claim 1. For example, Hanagan fails to teach receiving a rollover matrix indicating a number of units of call usage that are available for rolling over to a subsequent usage period and rolling over to the subsequent usage period the number of units of call usage that are available for rolling over.

In contrast, Hanagan merely discloses provide a customer care and billing system that is modular. For example, Hanagan discloses a customer care manager (CCM) 12 provides proactive customer support. See paragraph [0077]. In Hanagan, CCM 12 provides a flexible graphical user interface (GUI) customer service front-end system to use during customer acquisition, customer establishment, and customer maintenance. See paragraph [0077]. In addition to providing maintenance of this information, CCM 12 provides a forecasting mechanism which recommends products and price plans for customers. See paragraph [0077]. In other words, Hanagan provides an interface for customer service representative to provide account support. Thus, it is respectfully submitted that Hanagan fails to teach or disclose any type of rollover functionality, including rollover calling units and rollover matrices, with respect to wireless and wireline telecommunications usage. For example, a word search of Hanagan for the term “rollover” returned zero hits. Therefore, based on the foregoing, amended claim 1 is allowable over Hanagan and the rejection of this claim should be withdrawn.

Claims 2-6, 10, and 30 depend from amended claim 1, and are thus allowable for at least the same reasons. Therefore, the rejection of these claims should also be withdrawn.

Amended independent claims 17 and 29 specify similar features as amended claim 1 and thus are allowable over Hanagan for at least the same reasons. Based on the foregoing, the Hanagan fails to teach, disclose, or suggest each of the features specified in claims 17 and 29. Therefore, claims 17 and 29 are allowable and the rejection of these claim should be also withdrawn.

Amended independent claim 19 specifies similar features as amended claim 1 and thus is allowable over Hanagan for at least the same reasons. Based on the foregoing, the Hanagan fails

to teach, disclose, or suggest each of the features specified in claim 19. Therefore, claim 19 is allowable and the rejection of this claim should be also withdrawn.

Claims 22 and 31 depend from amended claim 19, and are thus allowable for at least the same reasons. Therefore, the rejection of these claims should also be withdrawn.

Amended independent claim 23 specifies similar features as amended claim 1 and thus is allowable over Hanagan for at least the same reasons. Based on the foregoing, the Hanagan fails to teach, disclose, or suggest each of the features specified in claim 23. Therefore, claim 23 is allowable and the rejection of this claim should be also withdrawn.

Claims 24 and 25 depend from amended claim 23, and are thus allowable for at least the same reasons. Therefore, the rejection of these claims should also be withdrawn.

Amended independent claim 26 specifies similar features as amended claim 1 and thus is allowable over Hanagan for at least the same reasons. Based on the foregoing, the Hanagan fails to teach, disclose, or suggest each of the features specified in claim 26. Therefore, claim 26 is allowable and the rejection of this claim should be also withdrawn.

Claims 27 and 28 depend from amended claim 26, and are thus allowable for at least the same reasons. Therefore, the rejection of these claims should also be withdrawn.

Amended claim 11 specifies a method for synchronizing services between a first telecommunications services carrier and a second telecommunications services carrier. The method includes receiving a services order at a first services ordering platform of the first telecommunications services carrier requiring services changes that affect the second telecommunications services carrier; notifying the second telecommunications services carrier to provide the services order to the second telecommunications services carrier; on a periodic basis, updating a customer affiliate subscriber information database in a businesses services platform

the services changes that affect the second telecommunications services carrier; and on a periodic basis, synchronizing batch files passed from a subscriber data system of the first telecommunications services carrier to the customer affiliate subscriber information database to ensure the customer affiliate subscriber information database has complete information related to a subscriber to the first telecommunications services carrier and the second telecommunications services carrier.

It is respectfully submitted that Hanagan fails to teach or suggest each and every feature specified in amended claim 11. For example, Hanagan fails to teach on a periodic basis, updating a customer affiliate subscriber information database in a businesses services platform the services changes that affect the second telecommunications services carrier; and on a periodic basis, synchronizing batch files passed from a subscriber data system of the first telecommunications services carrier to the customer affiliate subscriber information database to ensure the customer affiliate subscriber information database has complete information related to a subscriber to the first telecommunications services carrier and the second telecommunications services carrier.

In contrast and as stated above, Hanagan merely discloses provide a customer care and billing system that is modular. For example, Hanagan discloses a customer care manager (CCM) 12 provides proactive customer support. See paragraph [0077]. In Hanagan, CCM 12 provides a flexible graphical user interface (GUI) customer service front-end system to use during customer acquisition, customer establishment, and customer maintenance. See paragraph [0077]. In addition to providing maintenance of this information, CCM 12 provides a forecasting mechanism which recommends products and price plans for customers. See paragraph [0077]. In other words, Hanagan provides an interface for customer service representative to provide

account support. In particular, Hanagan fails to teach or disclose on a periodic basis, updating a customer affiliate subscriber information database services changes that affect a second telecommunications services carrier; and on a periodic basis. In addition, Hanagan fails to teach or disclose synchronizing batch files to ensure the customer affiliate subscriber information database has complete information related to a subscriber to the first and second telecommunications services carriers. Thus, based on the foregoing, amended claim 11 is allowable over Hanagan and the rejection of this claim should be withdrawn.

Claims 12-14 and 16 depend from amended claim 11, and are thus allowable for at least the same reasons. Therefore, the rejection of these claims should also be withdrawn.

### **Conclusion**

In view of the foregoing amendments and remarks, this application is now in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is invited to call the Applicants' attorney at the number listed below.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 13-2725.

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